IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Roland E. **VILLACORTA et al.**	Art Unit: 3691
Application No.: 10/685,865	Examiner: Shrestha, Bijendra K.
Filed: October 15, 2003	Confirmation No.: 5769
For: **SYSTEM AND METHOD FOR MANAGING CREDIT RISK FOR INVESTMENT PORTFOLIOS**	

Mail Stop Amendment
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

AMENDMENT AND RESPONSE UNDER 37 C.F.R. §1.111

Applicants submit this document in response to the Office Action mailed August 17, 2009.

Amendments to the Specification begin on page 2 of this paper.

Amendments to the Claims begin on page 3 of this paper.

Remarks begin on page 7 of this paper.

CERTIFICATE OF TRANSMISSION

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being transmitted via the Office electronic filing system in accordance with 37 C.F.R. § 1.6(a)(4).

Dated: February 15, 2010 Signature: /Jacob P. Martinez #57924/ (Jacob Martinez)